

# **Exhibit C**

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**From:** Veglia Monica <mveglia@jamsadr.com>  
**Sent:** Wednesday, April 10, 2013 5:44 AM  
**To:** Jan Little; mgitter@cgsh.com; jormand@cgsh.com; mbarras@cgsh.com; ANeuman@gibsondunn.com; achampion@gibsondunn.com; cjoralemon@gibsondunn.com; jstavers@gibsondunn.com; Randy Mastro; sedelman@gibsondunn.com; WThomson@gibsondunn.com; Elliot Peters; Chris J. Young; John Keker; Justina K. Sessions; Matthew Werdegarr; Nikki K. Vo; Paula Blizzard; William S. Hicks; jgomez@gomezllc.com; cbryan@skv.com; Craig Smyser; Imurphy@skv.com; lveselka@skv.com; tydoyle@skv.com  
**Subject:** RE: Chevron Corporation vs. Donziger, Steven, et al. - REF# 1425013433

Received. Thank you.



Monica D. Veglia  
Case Manager

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**From:** Jan Little [mailto:JLittle@KVN.com]  
**Sent:** Tuesday, April 09, 2013 7:48 PM  
**To:** Veglia Monica; mgitter@cgsh.com; jormand@cgsh.com; mbarras@cgsh.com; ANeuman@gibsondunn.com; achampion@gibsondunn.com; cjoralemon@gibsondunn.com; jstavers@gibsondunn.com; Randy Mastro; sedelman@gibsondunn.com; WThomson@gibsondunn.com; Elliot Peters; Chris J. Young; John Keker; Justina K. Sessions; Matthew Werdegarr; Nikki K. Vo; Paula Blizzard; William S. Hicks; jgomez@gomezllc.com; cbryan@skv.com; Craig Smyser; Imurphy@skv.com; lveselka@skv.com; tydoyle@skv.com  
**Subject:** RE: Chevron Corporation vs. Donziger, Steven, et al. - REF# 1425013433

Dear Ms. Veglia:

I am writing on behalf of the Donziger defendants, in response to your query of last week about which firms will be responsible for Judge Katz' bills.

As we have previously informed Judge Kaplan (see attached letter), unless circumstances change, neither Mr. Donziger nor Defendants Camacho or Piaguaje are going to be able to pay any bills submitted by Mr. Gitter or Judge Katz. Further explanation can be found in the attached letter.

Very truly yours,

Jan Nielsen Little

KEKER & VAN NEST LLP  
Counsel for the Donziger Defendants

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**Jan Nielsen Little**  
Attorney at Law

**KEKER & VAN NEST** LLP

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**From:** Veglia Monica [<mailto:mveglia@jamsadr.com>]  
**Sent:** Tuesday, April 02, 2013 5:53 AM  
**To:** [mgitter@cgsh.com](mailto:mgitter@cgsh.com); [jormand@cgsh.com](mailto:jormand@cgsh.com); [mbarras@cgsh.com](mailto:mbarras@cgsh.com); [ANeuman@gibsondunn.com](mailto:ANeuman@gibsondunn.com); [achampion@gibsondunn.com](mailto:achampion@gibsondunn.com); [cjoralemon@gibsondunn.com](mailto:cjoralemon@gibsondunn.com); [jstavers@gibsondunn.com](mailto:jstavers@gibsondunn.com); Randy Mastro; [sedelman@gibsondunn.com](mailto:sedelman@gibsondunn.com); [WThomson@gibsondunn.com](mailto:WThomson@gibsondunn.com); Elliot Peters; Chris J. Young; Jan Little; John Keker; Justina K. Sessions; Matthew Werdegarr; Nikki K. Vo; Paula Blizzard; William S. Hicks; [jgomez@gomezllc.com](mailto:jgomez@gomezllc.com); [cbryan@skv.com](mailto:cbryan@skv.com); Craig Smyser; [lmurphy@skv.com](mailto:lmurphy@skv.com); [lveselka@skv.com](mailto:lveselka@skv.com); [tydoyle@skv.com](mailto:tydoyle@skv.com)  
**Subject:** Chevron Corporation vs. Donziger, Steven, et al. - REF# 1425013433

Good Afternoon Counsel,

This will confirm that as per the Court's order, Hon. Theodore Katz has been appointed as one of the Special Masters for this matter. Hon. Katz has an hourly rate of \$700, with a Case Management Fee of \$400 per party, per 10 hours. If you go beyond a 30hour threshold, the CMF will be reduced to 10% of the professional fees (see attached fee schedule).

Attached are Hon. Katz's disclosures for your review.

As for documents, I typically ask for the original and/or amended complaint, any moving papers already heard by the Court, and any pending motions (partial or fully briefed), HOWEVER, we can also discuss that at the preliminary conference. If the latter, we can conduct the preliminary conference in-person or via phone to discuss the materials you should submit, the scope of Hon. Katz's authority and the capacity he will serve in.

Should we be concerned with e-filing/PACER? In past discovery referee cases, the Discovery Master would decide motions on a rolling basis and would submit the decisions to us. Then we would submit the decisions to the Docketing Supervisor at the Courthouse as Counsel was not permitted to e-file JAMS documents.

Counsel should be aware ex-parte communication is not permitted (unless you want to agree otherwise).

I will wait for the parties to advise which firms will be responsible for the 50/50 fee split.

Please let me know if you have any questions.

Regards,  
Monica



THE RESOLUTION EXPERTS®



Monica D. Veglia  
Case Manager

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